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15 **UNITED STATES DISTRICT COURT**
16 **EASTERN DISTRICT OF CALIFORNIA**

18 PAUL GORDON, } Case No. 2:21-cv-02175-JAM-DB
19 Plaintiff(s) } Judge John A. Mendez
20 vs. } Magistrate Deborah Barnes
21 FORD MOTOR COMPANY, et al., } **JOINT STIPULATION TO**
22 Defendant(s). } **CONTINUE EXPERT**
23 } **DISCOVERY DEADLINES**
24 } **(THIRD REQUEST)**
25 } Removal Date: November 23, 2021
26 } Trial Date: February 26, 2024

1 **TO THE HONORABLE COURT:**

2 IT IS HEREBY STIPULATED by and between Plaintiff PAUL GORDON
3 (“Plaintiff”) and Defendant FORD MOTOR COMPANY (“Defendant”),
4 (collectively the “Parties”), by and through their respective counsel of record, as
5 follows:

6 WHEREAS, the Court previously granted a request to continue the trial and
7 related deadlines on March 9, 2023 (Dkt #21).

8 WHEREAS, the existing dates the Parties request to change are:

9 a. Initial Expert Disclosures: June 2, 2023
10 b. Supplemental Expert Disclosures: June 16, 2023
11 c. All Discovery Cut-Off: July 14, 2023

12 WHEREAS, Ford took the deposition of Plaintiff on April 10, 2023.

13 WHEREAS, Plaintiff attempted to take a Rule 30(b)(6) deposition, but
14 Ford’s witness was unavailable,

15 WHEREAS, the parties attempted to schedule a Vehicle Inspection, but
16 Ford’s expert was unavailable,

17 WHEREAS, the Parties have diligently worked to complete discovery,

18 WHEREAS, the deposition of Ford’s corporate representative and the
19 Vehicle Inspection have not been completed, the Parties request an extension in
20 the deadlines relating to the expert disclosures;

21 WHEREAS, this is the Parties’ third request to continue dates, the only
22 dates requested changed in this request are the dates for expert disclosures and
23 expert discovery;

24 WHEREAS, the Parties agree to continuing deadlines to the following
25 dates:

26 d. Initial Expert Disclosures: July 21, 2023
27 e. Supplemental Expert Disclosures: August 4, 2023
28 f. Expert Discovery Cut-Off: August 14, 2023

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2 WHEREAS, due to the aforementioned reasons, the Parties believe there is
3 good cause for their requested continuance of the above dates.

4 NOW, THEREFORE, IT IS HEREBY STIPULATED, and Counsel for the
5 parties hereby jointly request and stipulate to continue the expert discovery dates,
6 as listed above.

7 **SIGNATURE ATTESTATION**

8 Pursuant to Local Rule 5-4.3.4(a)(2)(i), I hereby certify that the content of
9 this document is acceptable to counsel for Defendant, and that I have obtained
10 authorization to affix her electronic signature to this document.

11 Respectfully submitted,

12 Dated: June 5, 2023

13 **STRATEGIC LEGAL PRACTICES, APC**

14 By: /s/ Michael Tracy
15 Michael Tracy
16 Attorneys for Plaintiff,
17 PAUL GORDON

18
19 Dated: June 5, 2023

20 By: /s/ Katherine Vilchez

21 Attorneys for Defendant,
22 FORD MOTOR COMPANY

ORDER

The Court, having considered the Joint Stipulation to Continue the Expert Discovery Deadlines, filed by the Parties, and upon finding that good cause exists, hereby ORDERS as follows:

1. The Joint Stipulation to Continue Expert Discovery Deadlines is **GRANTED**.
2. Expert Discovery Cut-Off is continued to **August 14, 2023**.
3. Initial Expert Disclosures are to be exchanged by **July 21, 2023**.
4. Supplemental Expert Disclosures are to be exchanged by **August 5, 2023**.
5. Counsel shall contact Judge Mendez' courtroom deputy, M York, via e-mail at myork@caed.uscourts.gov, prior to filing a stipulation and proposed order to continue the dates set forth in this order.

IT IS SO ORDERED.

Dated: June 05, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE